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April 6, 2011 2:20 PM  
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U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

**1:11-cv-351  
Paul L. Maloney  
U.S. District Judge**

**William Lewis Vinton III., Plaintiff In  
Pro Per.**

**V. Case Number:**

**NCO Financial Systems, Inc.  
Defendant.,**

**SUMMONS AND COMPLAINT.**

**This Summons And Complaint includes pendent  
state claims.**

**1. After receiving several automated calls from: NCO  
Financial Systems, Inc. To contact Anthony Davis at**

**1-800-956-4638. Regarding My Pacer Service Center.— US Court.— Remaining Amount Due Of \$ 60.43., Account Number ending in: xxx2733. Plaintiff sent a Cease And Desist Letter On: March 02, 2011., Requesting that Defendant no longer contact me regarding this debt under The Fair Debt Collections Practice Act And The Michigan Collections Practice Act. ( Refer To Exhibit A. ).**

**2. Defendant Signed for my Cease And Desist Letter on March 07, 2011., Which was sent Certified Mail With Signature Delivery Confirmation. ( Refer To Exhibit B. ).**

**3. Despite the Defendant receiving my Cease And Desist Letter on March 07, 2011., They continue to call in reference to the \$ 60.43., still owed by automated messages in an attempt to collect a debt. ( Refer To Exhibit**

C. ).

Due to the continuous calls from the Defendant attempting to collect the remaining amount owed., Despite Defendant receiving and signing for my Cease And Desist Letter requesting they no longer contact me regarding this debt on March 07, 2011., Defendant violated the following: FDCPA { 805 15 U S C 1692. ( c )., { 806 15 U S C 1692. ( d )., ( 5 )., And The Michigan Occupational Code Act 299 Of 1980., 339. 1 15., Sec. 915., ( n )., ( q ). ( Refer To Exhibits D And E. ).

1.

Article 9 under PA 299 of 1980., Created The Michigan Collection Practices Board.

3.

**Due to numerous violations of the FDCPA { 805  
15 U S C 1692 ( c )., { 806 15 U S C 1692 ( d )., ( 5 ).,  
Plaintiff should be awarded the following under { 813  
15 U S C 1692 ( k ).**

- 1. Actual Damages**
- 2. Additional Damages the court may allow but not exceeding \$ 1,000.00.**
- 3. Court Costs.**
- 4. Attorney's Fees.**

**Plaintiff is also requesting the court award to him  
damages under The Michigan Occupational Code Act 299.**

**, 339.916., Sec. 916. (1), (2)., As Defendant willfully v  
violated The Michigan Occupational Code Act 339.915., Sec.  
915. (n)., due to them calling me repeatedly regarding this  
debt despite the Defendant receiving the Cease And Desist  
Letter On March 07, 2011., Which they signed for in the  
amount of \$ 1,200.00., which is \$ 150.00. Per willful viol  
ation which were eight in total after the Cease And Des  
ist Letter was received. ( Refer To Exhibits: A., B., C., A  
nd D. )., And for Defendant willfully violating The Michigan  
Occupation Code Act 339.915., Sec. 915. (q)., due to Def  
endants failure to implement a procedure designed to preve  
nt an violation by an employee as they placed automated  
phone calls in an attempt to collect a debt., despite recei**

ving a Cease And Desist Letter On March 07, 2011., In th  
e amount of \$ 1,200.00., Which is \$ 150.00. Per willful vi  
olation which were eight in total after the Cease And Des  
ist Letter was received. ( Refer To Exhibits: A., B., C.,  
And D. ).

Plaintiff should be awarded reasonable attorney's fees and  
costs incurred in connection with this action.

*Monday*  
*April 2014*  
Dated: April 2014

*William Lewis*  
*Vinton III*

William Lewis Vinton III., Plain  
tiff In Pro Per.  
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